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July 18, 2022

Via ECF

Hon. Ronnie Abrams
United States District Judge
Southern District of New York
40 Foley Square, Courtroom 1506
New York, NY 10007

Taveras v. Soojian, Inc.
Civil Action No. 1:22-cv-04439-RA

Dear Judge Abrams:

My firm has recently been engaged to represent the Defendant in the above-referenced case. Pursuant to Rules 1(A) and 1(D) of Your Honors' Individual Rules and Practices in Civil Cases, we write jointly with Plaintiff's counsel to seek the Court's permission to stipulate to and extend Defendant's time to answer or otherwise respond.

We propose a deadline of Friday, August 12, 2022. The parties agree that this will allow adequate time for meaningful settlement discussions.

Plaintiff's counsel has reviewed and approved this letter. In exchange for such consent, Defendant hereby waives the defense of insufficient service of process, while reserving all other rights and defenses. This is the first application of this nature in this matter.

Thank you for your consideration of this request.

Respectfully submitted,

John J. Thompson, Esq.
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cc: Plaintiff's counsel (*via ECF*)

Application granted.

SO ORDERED.

A handwritten signature in blue ink, appearing to be 'R. Abrams', written over a horizontal line.

Hon. Ronnie Abrams

7/19/22